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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 OAKLAND DIVISION
14

15 UNITED STATES OF AMERICA,)	CR 17-00191-JST-2
)	
16 Plaintiff,)	STIPULATION AND PROPOSED ORDER TO
)	CONTINUE INITIAL APPEARANCE OF
17 v.)	DEFENDANT SHARON RINGGENBERG AND
)	TO EXCLUDE TIME UNDER THE SPEEDY
18 KENNETH TAYLOR,)	TRIAL ACT
SHARON RINGGENBERG, and)	
19 CRAIG SCOTT,)	
)	
20 Defendants.)	
)	

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22 The United States of America, by and through its counsel of record, and Sharon Ringgenberg,
23 through attorney James J. Brosnahan, hereby STIPULATE and AGREE as follows:

24 1. On April 14, 2017, a federal grand jury in the Northern District of California returned a
25 five-count Indictment alleging that Defendants Kenneth Taylor, Sharon Ringgenberg, and Craig Scott
26 conspired to and that Kenneth Taylor and Sharon Ringgenberg did commit wire fraud with respect to a
27 business providing fraudulent standby letters of credit and proof of funds statements, in violation of 18
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1 U.S.C. §§ 1343 and 1349, and that Kenneth Taylor signed and filed false 2009 and 2010 federal income
2 tax returns in which he failed to report income from the fraud scheme, in violation of 26 U.S.C. §
3 7206(1).

4 2. On May 22, 2017, the Court issued a Protective Order regarding the discovery materials
5 that the government plans to serve on Defendants. *See* Doc. No. 17.

6 3. On May 25, 2017, the government served initial discovery on all defendants. The
7 government estimates that this production contains in excess of 70,000 pages of documents.

8 4. On May 26, 2017, Kenneth Taylor and Craig Scott, represented by their respective
9 counsel, and the government, represented by Assistant U.S. Attorney Colin Sampson, appeared for an
10 initial status hearing before United States District Judge Jon S. Tigar. The matter was continued to July
11 21, 2017, in order for counsel to review recently-produced discovery.

12 Accordingly, the United States and Defendant Sharon Ringgenberg, hereby STIPULATE AND
13 AGREE that the initial appearance of Sharon Ringgenberg before the District Court should be continued
14 to Friday, July 21, 2017, at 9:30 a.m., and that time under the Speedy Trial Act be excluded from today
15 until July 21, 2017, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (b)(iv) to allow for effective preparation
16 of counsel, taking into account the exercise of due diligence.

17 Respectfully submitted,

18 BRIAN J. STRETCH
19 United States Attorney

20 Dated: June 5, 2017.


/s/ Colin Sampson
COLIN SAMPSON
Assistant United States Attorney
GREGORY D. BERNSTEIN
Trial Attorney

23 Dated: June 5, 2017.

/s/ James J. Brosnahan
JAMES J. BROSNAHAN
Attorney for Defendant Sharon Ringgenberg

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IT IS SO ORDERED.


THE HONORABLE JON S. TIGAR
UNITED STATES DISTRICT JUDGE